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7 **UNITED STATES DISTRICT COURT**
 8 **DISTRICT OF NEVADA**

9 RICKY LEE KELLY,
 10 Plaintiff,

CASE NO.: 2:25-cv-00585-MMD-MDC

11 vs.

12 JASON RYAN RALPHS, an Individual; THE
 13 CHURCH OF JESUS CHRIST OF LATTER-
 DAY SAINTS, a Utah Corporation Sole;
 14 DOES I through X; and ROE BUSINESS
 15 ENTITIES I through X, inclusive,
 Defendants

JOINT DISCOVERY PLAN AND
SCHEDULING ORDER

16 Pursuant to Rule 26 (f), of the Federal Rules of Civil Procedure (“FRCP”) and Local Rule
 17 26-1(a), Plaintiff, Defendants (collectively referred to as “Parties”), each acting through their
 18 respective undersigned counsel, hereby respectfully submit the instant Stipulated Discovery Plan
 19 and Scheduling Order.

20 **SUBMITTED IN COMPLIANCE WITH LR 26-1(b)**

21 **Information Required Under Fed. R. Civ. P. 26(f)**

22 1. **Changes in timing, form or requirement for disclosures.**

23 a. Initial disclosures will be provided by the Parties in accordance with

24 FRCP 26(a)(1) on or before May 5, 2025.

25 2. **Subject of Discovery.** The Parties anticipate Discovery may take place regarding:

- a. The facts and circumstances that will enable the Court to determine the validity of the allegations found in Plaintiff's Complaint, if any;
- b. The facts and circumstances that will enable the Court to determine the validity of defenses asserted by the Defendants;
- c. Deposition testimony from all Parties and any witnesses identified by any Party.

Any party may propound Discovery as allowed by the Federal Rules of Civil Procedure, the Local Rules of the Court and this Order. The Parties reserve any general Discovery matter as needed.

3. **Completion of Discovery.** The Parties anticipate that Discovery focused on the above issues can be completed within six months (180 days) from the date in which the first meeting conferred, which would generate a **Discovery Cut-Off Date of October 15, 2025**.

4. Orders under Fed. R. Civ. P. 26 (c). The Parties are not aware of any other matter or order which should be entered under these Rules.

Information Required Under LR 26-1(b)

5. Discovery Cut-Off Date. Discovery shall be completed by **October 15, 2025**.

6. Amending the Pleadings and Adding Parties. Motions to amend pleadings, or to add parties, shall be filed not later than ninety (90) days prior to the close of Discovery, or **July 17, 2025**.

7. Fed. R. Civ. P. 26(a)(2) Disclosures (Experts). The Parties will disclose experts, if any, not later than sixty (60) days prior to the close of Discovery, or **August 15, 2025**. Rebuttal experts shall be disclosed within thirty (30) days after the initial disclosure of experts and no later than **September 15, 2025**.

8. LR 26-3 Interim Status Report. Not later than sixty (60) days prior to the close of Discovery, or **August 15, 2025**, the Parties shall submit an Interim Status Report stating the estimated time for trial, three (3) alternative available trial dates, and the opinions of their counsel regarding the potential for substantive motions to eliminate the need for a trial or affect trial length. The Parties must also certify that they considered consent to trial by a magistrate judge under 28 U.S.C. § 636(c) and Fed. R. Civ. P. 73, use of the Short Trial Program (General Order 213-01), and the use of alternative dispute-resolution processes including mediation, arbitration, and early neutral evaluation.

9. **Dispositive Motions.** The Parties will file Dispositive Motions, if any, not later than thirty (30) days after the Discovery Cut-Off Date, or **November 14, 2025.**

10. Pretrial Order. The Parties shall file the joint Pretrial Order no later than thirty (30) days after the date set for filing Dispositive Motions, or **December 15, 2025**. If the Parties file Dispositive Motions, then the duty to submit a Pretrial Order shall be suspended until thirty (30) days after the final decision on the Dispositive Motions or further Order of the Court.

11. Fed. R. Civ. P. 26(a)(3) Disclosures. All disclosures required by Fed. R. Civ. P. 26(a)(3) and any objections thereto shall be included in the Pretrial Order.

12. Extension of Discovery Deadlines. Requests to extend the discovery deadlines set forth in this Stipulated Discovery Plan and Scheduling Order must be filed with the Court in accordance with Local Rule 26-4.

13. Alternative Dispute Resolution. The Parties certify that they met and conferred about the possibility of using alternative dispute-resolution processes including mediation, arbitration, and if applicable, early neutral evaluation.

1 14. Alternative Forms of Case Disposition. The Parties certify that they considered
 2 consent to trial by a magistrate judge under 28 U.S.C. § 636(c) and Fed. R. Civ. P. 73 and use of
 3 the Short Trial Program (General Order 2013-01).

4 Dated this 16th day of May, 2025.
 5
 APPROVED AS TO FORM AND CONTENT
 6
 7 LAW OFFICES OF KEVIN R. HANSEN KIRTON McCONKIE, P.C.
 8
 9 */s/ Amanda A. Harmon* */s/ Matthew M. Pruitt*
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 15 Las Vegas, Nevada 89146 *Attorneys for Jason Ryan Ralphs and*
 16 *Attorneys for Plaintiff* *The Church of Jesus Christ of Latter-day*
 17 *Saints, a Utah corporation sole*

15 **IT IS SO ORDERED:** Denied without prejudice. The
 16 parties' amended stipulation does not cure the deficiencies
 17 noted in the Court's 05/09/25 Order (ECF No. 12). The
 18 parties still request a period longer than 180 days from the
 19 date the first defendant appeared, March 31, 2025. Under LR
 20 26-1, 180 days is measured from the date the first defendant
 21 appears, not the date of the parties' Rule 26(f) conference.
 22 The parties fail to show good cause for longer period. LR
 23 26-3 has been amended and no longer requires an interim
 24 status report. The parties are kindly directed to please
 25 review the Court's prior order, the Local Rules, and submit a
 26 compliant stipulated discovery plan and scheduling order by
 27 May 27, 2025.

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 30 UNITED STATES MAGISTRATE JUDGE
 31 _____
 32 DATED: 5-19-25
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